

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ROME DIVISION**

COOSA RIVER BASIN INITIATIVE,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No.
)	4:23-cv-00088-WMR
)	
MOUNT VERNON MILLS, INC, and)	
TOWN OF TRION, GEORGIA)	
)	
Defendants.)	

JOINT MOTION TO APPROVE CONSENT DECREE

COME NOW all Parties to this action and hereby jointly move the Court to approve and enter the attached Proposed Consent Decree, see Exhibit A, after the statutorily required 45-day review period by the relevant federal agencies.

As required by 40 C.F.R. § 135.5(b)(1), Plaintiff hereby notifies the Court that under Section 1365(c)(3) of the Federal Water Pollution Control Act (“Clean Water Act” or “CWA”) the Court should not enter the Proposed Consent Decree “prior to 45 days following the receipt of a copy of the proposed consent judgment by the Attorney General and the Administrator [of the U.S. Environmental Protection Agency].” 33 U.S.C. § 1365(c).

In a later filing, Plaintiff shall promptly “notify the Court . . . regarding the dates of service of the proposed consent judgment upon the Administrator and Attorney General,” as required by 40 C.F.R. § 135.5(b)(2), so that the Court may then enter the Proposed Consent Decree.

Respectfully submitted this 9th day of May, 2023.

**SOUTHERN ENVIRONMENTAL
LAW CENTER**

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CERTIFICATE OF COMPLIANCE

Pursuant to Northern District of Georgia Civil Local Rule 7.1.D, the undersigned counsel certified that the foregoing filing is prepared in Times New Roman 14-point font, as mandated in Local Rule 5.1.C.

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing **JOINT MOTION TO APPROVE CONSENT DECREE** has been filed electronically with the Clerk of Court by using the Court's CM/ECF system, which will serve notice of filing to all registered users.

This 9th day of May, 2023

/s/ Christopher J. Bowers
Christopher J. Bowers